Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	**Marathon Ashland Petroleum LLC**
Source Location:	**4648 North Meridian Road, Huntington, IN 46750**
County:	**Huntington**
SIC Code:	**5171**
Operation Permit No.:	**F 069-14954-00002**
Permit Reviewer:	**Craig J. Friederich**

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Marathon Ashland Petroleum LLC relating to the operation of a petroleum products distribution source. Marathon Ashland Petroleum LLC. was issued FESOP 069-7491, on August 1, 1997.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) loading rack, installed in 1992, equipped with one (1) permanent vapor combustion unit, and a backup portable vapor combustor of either a RANE Model RAN PEVB15, or a John Zink Model GV-LH-8400-2.

(b) One (1) floating roof liquid storage tank, storing gasoline, distillate, or neat ethanol, identified as Tank 34-425, installed in 1956, capacity: 1,437,030 gallons.

(c) One (1) floating roof liquid storage tank, storing gasoline, distillate, or neat ethanol, identified as Tank 22-426, installed in 1956, equipped with a geodome, installed in 1993, capacity: 934,584 gallons.

(d) One (1) floating roof liquid storage tank, storing gasoline, distillate, or neat ethanol, identified as Tank 27-427, installed in 1956, equipped with a geodome, installed in 1993, capacity: 1,145,928 gallons.

(e) One (1) floating roof liquid storage tank, storing gasoline, distillate, or neat ethanol, identified as Tank 23-429, installed in 1956, capacity: 962,514 gallons.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new facilities proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) The following VOC and HAP storage containers: Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.

(b) Groundwater oil recovery wells.

(c) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(d) Process vessel degassing and cleaning to prepare for internal repairs.

(e) Stockpiled soils from soil remediation activities that are covered and waiting transport for disposal.

(f) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(g) Abrasive blast and/or painting of tanks, piping and miscellaneous terminal equipment and structures.

(h) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

(i) One (1) fixed roof liquid storage tank, storing distillate, identified as Tank 24-428, installed in 1956, capacity: 996,870 gallons.

(j) One (1) fixed roof liquid storage tank, storing distillate, identified as Tank 41-430, installed in 1958, capacity: 1,734,936 gallons.

(k) One (1) fixed roof liquid storage tank, storing gasoline or distillate additive, identified as Tank AA-1-431, installed in 1981, capacity: 9,870 gallons.

(l) One (1) fixed roof liquid storage tank, storing distillate or neat ethanol, identified as Tank 1-432, installed in 1987, capacity: 15,414 gallons.

(m) One (1) fixed roof liquid storage tank, storing gasoline or distillate additive, identified as Tank AA-1-433, installed in 1995, capacity: 2,016 gallons.

(n) One (1) electric heat pump.

(o) One (1) underground oil/water seperator, used to process storm water and collect petroleum drippage from the loading rack area, equipped with two (2) screened vents, capacity: 10,000 gallons.

Existing Approvals

(a) FESOP 069-7491-00002, issued on August 1, 1997; and expires on August 1, 2002;

(b) AAF069-9024-00002, issued on December 3, 1997;

(c) AAF 069-9273-00002, issued March 13, 1998; and

(d) AAF 069-14415-00002, issued July 3, 2001.

All conditions from previous approvals were incorporated into this FESOP.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on September 19, 2001. Additional information was received on February 7, 2002.

There was no notice of completeness letter mailed to the source.

Emission Calculations

The calculations submitted by the applicant for F 069-7491 have been verified and found to be accurate and still valid.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	**Unrestricted Potential Emissions** (tons/year)
PM	1.00
PM_{10}	1.00
SO_2	0.00
VOC	743
CO	0.00
NO_X	0.00

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPS	Unrestricted Potential Emissions (tons/year)
Toluene	14.23
Other HAPS	29.96
TOTAL HAPS	44.2

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is greater than one-hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of a combination HAPS is greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on August 1, 1997, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F 069-7491-00002; issued on August 1, 1997).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPS**
Loading Rack	--	--	--	54.3	--	--	3.19
Tank 34-425	--	--	--	1.68	--	--	0.098
Tank 22-426	--	--	--	1.64	--	--	0.096
Tank 27-427	--	--	–	1.44	--	--	0.084
Tank 23-429	--	--	--	1.55	--	--	0.091
Fugitive Emissions (Valves, Flanges and Pump Seals)	--	--	--	0.456	--	--	0.030
Insignificant Activities	1.00	1.00	--	3.23	--	--	0.194

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPS**
Total PTE After Issuance	1.00	1.00	--	64.3	--	--	Single less than 10 Total less than 25

County Attainment Status

The source is located in Huntington County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

(a) The one (1) fixed roof liquid storage tank, storing distillate or neat ethanol, identified as Tank 1-432, installed in 1987, with a capacity of 15,414 gallons, which is classified as an insignificant activity, is subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.116b, Subpart Kb) because it was constructed after the rule applicability date of July 23, 1984 and it's storage capacity is greater than forty (40) cubic meters or 10,567 gallons. Since the storage capacity is less than seventy-five (75) cubic meters, or 19,812 gallons, the permittee is only required to keep records pursuant to 40 CFR Part 60, Subpart Kb.

(1) Pursuant to this rule, the owner or operator of Tank 1-432 shall keep copies of all records required by this section, except for the records required by paragraph (2), for at least two (2) years. The records required by paragraph (2) of this section shall be kept for the life of the source.

(2) The owner or operator of Tank 1-432 as specified in 40 CFR 110b(a) shall keep readily accessible records showing the dimension of the storage vessel and analysis showing the capacity of the storage vessel.

(b) The four (4) floating roof liquid storage tanks, identified as Tank 34-425, Tank 22-426, Tank 27-427, and Tank 23-429, each installed in 1956, predate the Subpart K, Ka, and Kb applicability dates. Therefore, these tanks are not subject to the requirements of these

subparts. The addition in 1993 of a geodome on Tank 22-426 and Tank 27-427, is not considered a reconstruction because the installation cost was less than 50% of the replacement cost of the tank.

(c) The two (2) fixed roof liquid storage tanks, identified as Tank 24-428 and Tank 41-430, installed in 1956 and 1958, respectively, which are classified as insignificant activities, predate the Subpart K, Ka, and Kb applicability dates. Therefore, these tanks are not subject to the requirements of these subparts.

(d) The one (1) fixed roof liquid storage tank, storing gasoline or distillate additive, identified as AA-1-431, installed in 1981, classified as an insignificant activity, is not subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110a - 115a, Subpart Ka) because even though it was constructed between the rule applicability dates of May 18, 1978 and July 23, 1984, it's storage capacity is less than 40,000 gallons.

(e) The one (1) fixed roof liquid storage tank, storing gasoline or distillate additive, identified as AA-1-433, installed in 1995, classified as an insignificant activity, is not subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110b - 117b, Subpart Kb) because even though it was constructed after the rule applicability date of July 23, 1984, it's storage capacity is less than forty (40) meters cubed, or 10,566 gallons.

(f) The one (1) loading rack, installed in 1992, equipped with one (1) permanent vapor combustion unit, and a backup portable vapor combustor of either a RANE Model RAN PEVB15, or a John Zink Model GV-LH-8400-2 is subject to the requirements of the New Source Performance Standards (326 IAC 12) (40 CFR 60.500 through 60.506, Subpart XX) because this rack was constructed after the rule applicability date of December 17, 1980. The Permittee of each bulk gasoline terminal containing an affected facility shall comply with the following requirements:

(1) Each affected facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading.

(2) The emissions to the atmosphere from the vapor collection system due to the loading of liquid product into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter of gasoline loaded.

(3) Each vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack.

(4) Loadings of liquid product into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

(A) The Permittee shall obtain the vapor tightness documentation described in 40 CFR 60.505(b) for each gasoline tank truck which is to be loaded at the affected facility.

(B) The Permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the affected facility.

(C) The Permittee shall cross-check each tank identification number obtained in paragraph (4)(B) with the file of tank vapor tightness documentation

within 2 weeks after the corresponding tank is loaded, unless either of the following conditions is maintained:

(i) If less than an average of one gasoline tank truck per month over the last 26 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed each quarter; or

(ii) If less than an average of one gasoline tank truck per month over the last 52 weeks is loaded without vapor tightness documentation then the documentation cross-check shall be performed semi-annually.

If either the quarterly or semiannual cross-check provided in paragraphs (4)(C) (i) and (ii) reveals that these conditions were not maintained, the source must return to biweekly monitoring until such time as these conditions are again met.

(D) The terminal Permittee shall notify the Permittee of each non-vapor-tight gasoline tank truck loaded at the affected facility within 1 week of the documentation cross- check in paragraph (4)(C) of this section.

(E) The terminal Permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the affected facility until vapor tightness documentation for that tank is obtained.

(F) Alternate procedures to those described in paragraphs (4)(A) through (E) for limiting gasoline tank truck loadings may be used upon application to, and approval by, the Administrator.

(5) The Permittee shall act to assure that loadings of gasoline tank trucks at the affected facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system.

(6) The Permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the affected facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks.

(7) The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in 40 CFR 60.503(d).

(8) No pressure-vacuum vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water).

(9) Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are

acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

(g) This source will still not be subject to Gasoline Distribution NESHAP 40 CFR Part 63, Subpart R, Gasoline Distribution. Marathon Ashland Petroleum LLC. has agreed to limit the input of gasoline and/or neat ethanol delivered to the one (1) loading rack to 365,000,000 gallons per twelve (12) consecutive month period, the amount of kerosene delivered to the one (1) loading rack to 20,000,000 gallons per twelve (12) consecutive month period, the amount of No.2 fuel oil delivered to the one (1) loading rack to 201,000,000 gallons per twelve (12) consecutive month period, and the amount of additives delivered to the one (1) loading rack to 200,000 gallons per twelve (12) consecutive month period This limits the emissions of HAPS to below the major source levels of ten (10) tons per year for any given individual HAP and twenty-five (25) tons per year for the combination of all HAPS. Therefore, the requirements of this rule do not apply.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

All the significant tanks located at the source were constructed prior to the rule applicability date of August 7, 1977. All the tanks constructed after 1980 are classified as insignificant activities. The one (1) loading rack, which was constructed in 1992, which has the potential to emit VOC greater than two hundred-fifty (250) tons per year, is limited to emissions of less than one-hundred (100) tons per year. This limitation ensures that the emissions from the entire source are less than two hundred-fifty (250) tons per year, which renders the requirements of 326 IAC 2-2 not applicable . The Significant Permit Revision issued in 1999 was for the installation of a control device.

326 IAC 2-4.1-1 (New Source Toxics Control)

There are no facilities located at this source that were constructed after July 27, 1997. Therefore, 326 IAC 2-4.1-1 is not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Huntington County and the potential to emit all criteria pollutants is less than one hundred (100) tons per year. Therefore 326 IAC 2-6 does not apply.

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of VOC shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPS shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply. In order to comply with these limits, the annual throughput of gasoline and/or neat ethanol delivered to the one (1) loading rack shall be limited to 365,000,000 gallons per twelve (12) consecutive month period, the amount of kerosene delivered to the one (1) loading rack shall be limited to 20,000,000 gallons per twelve (12) consecutive month period, the amount of No.2 fuel oil delivered to the one (1) loading rack shall be limited to 201,000,000 gallons per twelve (12) consecutive month period, and the amount of additives delivered to the one (1) loading rack shall be limited to 200,000 gallons per twelve (12) consecutive month period.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-4-3 (Petroleum Liquid Storage Facilities)

(a) The four (4) floating roof liquid storage tanks, identified as Tank 34-425, Tank 22-426, Tank 27-427, and Tank 23-429, each installed in 1956, are not subject to the requirements of 326 IAC 8-4-3 because each was constructed prior to the rule applicability date of January 1, 1980.

(b) The two (2) fixed roof liquid storage tanks, identified as Tank 24-428 and Tank 41-430, installed in 1956 and 1958, respectively, which are classified as insignificant activities, are not subject to the requirements of 326 IAC 8-4-3 because each was constructed prior to the rule applicability date of January 1, 1980.

(c) The one (1) fixed roof liquid storage tank, storing distillate or neat ethanol, identified as 1-432, installed in 1987, which is classified as an insignificant activity, is not subject to the requirements of 326 IAC 8-4-3, because this tank stores volatile organic compounds whose true vapor pressure is less than 10.5 kilopascals or 1.52 pounds per square inch.

(d) The one (1) fixed roof liquid storage tank, storing gasoline or distillate additive, identified as AA-1-431, installed in 1981, which is classified as an insignificant activity, is not subject to the requirements of 326 IAC 8-4-3, because this tank has a storage capacity of less than 39,000 gallons.

(e) The one (1) fixed roof liquid storage tank, storing gasoline or distillate additive, identified as AA-1-433, installed in 1995, which is classified as an insignificant activity, is not subject to the requirements of 326 IAC 8-4-3, because this tank has a storage capacity of less than 39,000 gallons.

326 IAC 8-4-4 (Bulk Gasoline Terminals)

This source is subject to the requirements of 326 IAC 8-4-4 because the one (1) loading rack and vapor combustion unit was installed after January 1, 1980, and the source loads gasoline into trucks and therefore must control VOC emissions with an adsorber or condensation system. This rule requires that:

(a) No owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:

(1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:

(A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 milligrams per liter of VOC to the atmosphere.

(B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.

(C) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (A) above.

(2) Displaced vapors and gases are vented only to the vapor control system.

(3) A means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.

(4) All loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

(b) If employees of the owner of the bulk gasoline terminal are not present during loading, it shall be the responsibility of the owner of the transport to make certain the vapor control system is attached to the transport. The owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with this section.

The one (1) loading rack, installed in 1992, equipped with one (1) permanent vapor combustion unit, and a backup portable vapor combustor of either a RANE Model RAN PEVB15, or a John Zink Model GV-LH-8400-2 complies with this rule.

326 IAC 8-4-7 (Petroleum Sources: Gasoline Transports)

This source is subject to the requirements of 326 IAC 8-4-7 because the one (1) loading rack and vapor combustion unit was installed after January 1, 1980, and the source transports gasoline into storage tanks. This rule requires that:

(a) No owner or operator of a gasoline transport shall cause, allow, or permit the transfer of gasoline between transports and storage tanks that are equipped with a vapor balance system or vapor recovery system unless:

(1) the vapor balance system or vapor recovery system is connected and operating according to manufacturers' specifications;

(2) gasoline transport compartment hatches are closed at all times during loading operations;

(3) except as provided in section 9(i) of this rule (stack testing) and for sources subject to 40 CFR 60.503(b)* (NESHAP/MACT) or 40 CFR 63.425(a)* (New Source Performance Standards) requirements, there are no visible leaks, or otherwise detectable leaks (measured at twenty-one thousand (21,000) parts per million as propane as specified in 40 CFR 63.425(f)(1)*), in the gasoline transport's pressure/

vacuum relief valves, hatch cover, trailer compartments, storage tanks, or associated vapor and liquid lines during loading or unloading; and

(4) the pressure relief valves on gasoline transports are set to release at no less than four and eight-tenths (4.8) kilo Pascals (seven-tenths (0.7) pounds per square inch).

(b) Tank wagons are exempt from vapor balance requirements.

(c) When employees of the owner of a bulk gasoline terminal are present to supervise or perform loading, the owner of the terminal shall be responsible for compliance with subsection (a)(1) through (a)(3). The owner of the terminal shall also ensure that owners of gasoline transports loading at the terminal during unsupervised times comply with this section.

(d) Gasoline transports must be designed, maintained, and operated so as to be vapor-tight.

(e) Transfer of gasoline between a gasoline transport and a storage tank that is not equipped with a vapor balance system or vapor recovery system is not subject to this section.

326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems; Records)

This source is subject to the requirements of 326 IAC 8-4-9 because the source operates a vapor control system. The requirements are as follows:

(a) No person shall allow a gasoline transport that is subject to this rule and that has a capacity of two thousand (2,000) gallons or more to be filled or emptied unless the gasoline transport completes the following:

(1) Annual leak detection testing before the end of the twelfth calendar month following the previous year's test, according to test procedures contained in 40 CFR 63.425 (e)*, as follows:

(A) Conduct the pressure and vacuum tests for the transport's cargo tank using a time period of five (5) minutes. The initial pressure for the pressure test shall be four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. The initial vacuum for the vacuum test shall be one hundred fifty (150) millimeters H_2O (six (6) inches H_2O) gauge. The maximum allowable pressure or vacuum change is twenty-five (25) millimeters H_2O (one (1) inch H2O) in five (5) minutes.

(B) Conduct the pressure test of the cargo tank's internal vapor valve as follows:

(i) After completing the test under clause (A), use the procedures in 40 CFR 60, Appendix A, Method 27* to repressurize the tank to four hundred sixty (460) millimeters H_2O (eighteen (18) inches H_2O) gauge. Close the transport's internal vapor valve or valves, thereby isolating the vapor return line and manifold from the tank.

(ii) Relieve the pressure in the vapor return line to atmospheric pressure, then reseal the line. After five (5) minutes, record the gauge pressure in the vapor return line and manifold. The maximum allowable five (5) minute pressure increase is one hundred thirty

(130) millimeters H_2O (five (5) inches H_2O).

(2) Repairs by the gasoline transport owner or operator, if the transport does not meet the criteria of subdivision (1), and retesting to prove compliance with the criteria of subdivision (1).

(b) The annual test data remain valid until the end of the twelfth calendar month following the test. The owner of the gasoline transport shall be responsible for compliance with subsection (b) and shall provide the owner of the loading facility with the most recent valid modified 40 CFR 60, Appendix A, Method 27* test results upon request. The owner of the loading facility shall take all reasonable steps, including reviewing the test date and tester's signature, to ensure that gasoline transports loading at its facility comply with subsection (a).

(c) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:

(1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:

(A) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H_2O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H_2O) in the gasoline transport;

(B) except for sources subject to 40 CFR 60.503(b)* (NESHAP/MACT) or 40 CFR 63. 425(a)* (New Source Performance Standards) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21*, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(2) within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).

(d) The department may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (a) or (b).

(e) The owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all certification testing. The records shall identify the following:

(1) The vapor balance, vapor collection, or vapor control system.

(2) The date of the test and, if applicable, retest.

(3) The results of the test and, if applicable, retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.

(f) The owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:

(1) The gasoline transport.

(2) The type and date of the test and, if applicable, date of retest.

(3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.

(g) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.

(h) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (c)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:

(1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).

(2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

State Rule Applicability - Insignificant Activities

326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from the abrasive blast and/or painting of tanks, piping and miscellaneous terminal equipment and structures, shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

Testing Requirements

All testing requirements from previous approvals were incorporated into this FESOP. The VOC compliance stack test shall be performed between December 19, 2002 and June 19, 2003 which corresponds to five (5) years since the latest valid stack test plus one hundred and eighty (180) days at the permanent vapor combustion unit to demonstrate compliance with 326 IAC 8-4-4. These tests shall be performed according to 40 CFR 60, Appendix A, Methods 25 and 25A.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

> Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

The one (1) loading rack, installed in 1992, equipped with one (1) permanent vapor combustion unit, and a backup portable vapor combustor of either a RANE Model RAN PEVB15, or a John Zink Model GV-LH-8400-2:

(a) For the one (1) permanent vapor combustion unit, daily checks of the key operating parameters, including verification of pilot flame presence using a thermocouple or flame sensor.

(b) For the backup portable vapor combustor of either a RANE Model RAN PEVB15, or a John Zink Model GV-LH-8400-2, daily checks of the key operating parameters, including verification of pilot flame presence using a thermocouple or flame sensor.

Please note as stated in the TSD Addendum for F 069-7941 the requirement that the vapor combustion unit maintain a minimum operating temperature of 1400 degrees Fahrenheit was replaced with the requirement that a thermocouple be used to indicate the presence of a flame.

These monitoring conditions are necessary to comply with 326 IAC 2-8, 326 IAC 8-4-4, and NSPS Subpart XX.

Conclusion

The operation of this petroleum products distribution source shall be subject to the conditions of the attached proposed FESOP No.: F 069-14954-00002.